

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Cheryl Sagataw, DeAnthony Barnes, Roberta Strong, Travis Neloms, Alvin Butcher, Adrian Tiger, Chance Askenette, Deven Caston, Lola Hegstrom, and RonDel Applebee, *on behalf of themselves and all others similarly situated,*

Case No. 24-cv-0001 (ECT/TNL)

**NOTICE OF DEPOSITION OF  
TODDRICK BARNETTE**

Plaintiffs,

vs.

Mayor Jacob Frey, *in his individual and official capacity,*

Defendant.

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Please take notice that Plaintiffs Cheryl Sagataw, DeAnthony Barnes, Roberta Strong, Travis Neloms, Alvin Butcher, Adrian Tiger, Chance Askenette, Deven Caston, Lola Hegstrom, and RonDel Applebee, on behalf of themselves and the putative class of those similarly situated, (“Plaintiffs”) will take the deposition of Toddrick Barnette, of 250 S. 4th St, Room 510, Minneapolis, MN 55415. This deposition is to occur via remote videoconferencing technology, as agreed by the parties, and will be taken before a certified court reporter authorized to administer oaths, and the parties agree that the court reporter may swear in the deponent remotely. Plaintiffs’ counsel’s office will circulate access instructions and/or dial-in instructions in advance of the deposition. Plaintiffs can be available any day in the next month that is convenient for Mr. Barnette except for December 12, 2024.

If remote videoconferencing technology becomes unavailable for more than thirty consecutive minutes during the deposition, then, at the option of Plaintiff’s counsel, Plaintiff may either proceed telephonically (or by remote videoconference with Plaintiff’s counsel’s video

turned off) or may adjourn the deposition and reconvene the deposition to continue in-person or by remote videoconference on a mutually convenient date.

Plaintiff intends to record the testimony by videoconference technology, in addition to recording the testimony by stenographic methods.

Dated: Dec. 2, 2024

s/Kira Kelley  
Kira Kelley (#402932)  
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